

July 16, 2001

Mr. Mike Ledzianowski
Plastech Decorating Systems, Inc.
11700 North State Road #37
Elwood, IN 46036

Re: **095-14419-00044**
First Minor Permit Modification to
Part 70 No.: **T 095-6536-00044**

Dear Mr. Ledzianowski:

Plastech Decorating Systems, Inc. was issued a permit on October 9, 1998 for a stationary motor vehicle plastic and metal parts coating operation. A letter requesting changes to this permit was received on May 29, 2001. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the addition of the following emission units:

One (1) plastic automotive door claddings surface coating process, with a maximum throughput rate of 60 units per hour, including:

- (a) one (1) surface coating booth, with PM/PM10 emissions controlled by a dry filter system, with emissions exhausted through Stack CE1,
- (b) one (1) 3.40 MMBtu/hr natural gas fired air make-up unit, and
- (c) one (1) 0.55 MMBtu/hr natural gas fired drying oven, with emissions exhausted through Stack CO-1.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
SDF

cc: File - Madison County
U.S. EPA, Region V
Madison County Health Department
Air Compliance Section Inspector - Warren Greiling
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT
and ANDERSON OFFICE OF AIR MANAGEMENT**

**Plastech Decorating Systems, Inc.
SR 37 and Brickyard Road
Elwood, Indiana 46036**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit: T095-6536-00044	Date Issued: October 9, 1998
First Administrative Amendment: T095-10019-00044	Date Issued: April 22, 1999
First Minor Permit Modification: T095-14419-00044	Affected Pages: 4 and 6, with Page 37a and 37b added
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 16, 2001

D.3 FACILITY OPERATION CONDITIONS - Auto Claddings Surface Coating Process

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.3.3 Particulate Matter (PM)

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.4 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.5 Record Keeping requirements

Certification Form
Emergency/Deviation Occurrence Report
Monthly Report Form - Clear Coat Paint Usage
Quarterly Report Form - VOC Input Usage
Compliance Report Form

- (5) One (1) coating booth, identified as the Adhesion Promoter Booth, coating a maximum of 240 plastic parts per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as ADB1A and ADB1B; and
- (6) One (1) coating booth, identified as the Primer Booth, coating a maximum of 240 plastic parts per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as PB1A, PB1B, and PB1C-

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Coating materials test booth.;
- (b) One (1) natural gas direct fired bake oven consisting of five (5) separate combustion zones identified as OPS-new (1.0 MMBtu/hr, rated), O1-new (3.5 MMBtu/hr, rated), O2-new (3.5 MMBtu/hr, rated), O3-new (3.5 MMBtu/hr, rated), and QZS-new (1.0 MMBtu/hr, rated), with a total heat input rate of 12.5 MMBtu/hr, all exhausting through four (4) stacks identified as ADOE1, ADOE2, ADEP1 and ADEP2.; and
- (c) One (1) plastic automotive door claddings surface coating process, with a maximum throughput rate of 60 units per hour, including:
 - (1) one (1) surface coating booth, with PM/PM10 emissions controlled by a dry filter system, with emissions exhausted through Stack CE1,
 - (2) one (1) 3.40 MMBtu/hr natural gas fired air make-up unit, and
 - (3) one (1) 0.55 MMBtu/hr natural gas fired drying oven, with emissions exhausted through Stack CO-1.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.3 FACILITY CONDITIONS

One (1) plastic automotive door claddings surface coating process, with a maximum throughput rate of 60 units per hour, including:

- (a) one (1) surface coating booth, with PM/PM10 emissions controlled by a dry filter system, with emissions exhausted through Stack CE1,
- (b) one (1) 3.40 MMBtu/hr natural gas fired air make-up unit, and
- (c) one (1) 0.55 MMBtu/hr natural gas fired drying oven, with emissions exhausted through Stack CO-1.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) overspray from the door claddings surface coating process shall be determined utilizing the following equation.

$$E = 4.10 * P^{0.67}$$

where: P = Process Weight Rate, tons/hr
E = Emission Rate, lb PM/hr

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination

D.3.3 Particulate Matter (PM)

In order to comply with Condition D.3.1, the PM control shall be in operation and controlling emissions at all times the automotive claddings surface coating process is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.4 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack CE-1 while the claddings surface coating process is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.5 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Exemption / Minor Permit Modification to a Part 70 Permit

Source Background and Description

Source Name:	Plastech Decorating Systems, Inc.
Source Location:	SR 37 and Brickyard Road, Elwood, Indiana 46036
County:	Madison
SIC Code:	3714
Operation Permit No.:	T 095-6536-00044
Operation Permit Issuance Date:	October 9, 1998
Minor Source Modification No.:	T 095-14419-00044
Permit Reviewer:	SDF

The Office of Air Quality (OAQ) has reviewed an exemption / minor permit modification application from Plastech Decorating Systems, Inc. relating to the operation of their existing stationary motor vehicle plastic and metal parts coating operation.

Background

On May 29, 2001, Plastech Decorating Systems, Inc. submitted an application to install a plastic automotive door claddings surface coating process at their existing motor vehicle plastic and metal parts coating operation. The proposed coating operation is described as follows:

One (1) plastic automotive door claddings surface coating process, with a maximum throughput rate of 60 units per hour, including:

- (a) one (1) surface coating booth, with PM/PM10 emissions controlled by a dry filter system, with emissions exhausted through Stack CE-1,
- (b) one (1) 3.40 MMBtu/hr natural gas fired air make-up unit, and
- (c) one (1) 0.55 MMBtu/hr natural gas fired drying oven, with emissions exhausted through Stack CO-1.

The emissions generated by the proposed coating process are volatile organic compounds (VOC), particulate matter (PM), PM10, and hazardous air pollutants (HAP). The emissions generated by the air make-up unit and drying oven are criteria pollutants and negligible amounts of HAPs.

The addition of the proposed surface coating operation will not allow increases in production of any other part of the vehicle parts coating operating.

The unrestricted potential to emit of all criteria pollutants from the surface coating operation are at exempt levels under 326 IAC 2-1.1-3. The single and combined HAP unrestricted potential to emit are also at exempt levels under 326 IAC 2-1.1-3.

Therefore, the proposed modification is an exemption under 326 IAC 2-1.1-3 for the purposes of New Source Review and an insignificant activity pursuant to 326 IAC 2-7-1(21).

The only new applicable requirement is 326 IAC 6-3-2 which limits the PM/PM10 overspray emissions from the proposed surface coating process.

The proposed modification shall be incorporated into the Title V permit via a minor permit modification pursuant to 326 IAC 2-7-12(b).

Existing Approvals

The source was issued Title V permit (095-6536-00044) on October 9, 1998. The source has been operating under this permit and the following approvals including, but not limited to, the following:

First Administrative Amendment: 095-10019-00044 Issued: 4-22-99

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that this exemption / minor permit modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application.

Emission Calculations

UNRESTRICTED POTENTIAL TO EMIT DUE TO THE MODIFICATION:

The following is a summary of the unrestricted potential to emit from the proposed surface coating process.

Summary of Unrestricted Potential to Emit:

	PM tons/yr	PM10 tons/yr	SO2 tons/yr	NOx tons/yr	VOC tons/yr	CO tons/yr
Surface Coating	4.11	4.11	-	-	7.90	-
Combustion	neg.	0.10	neg.	1.70	0.10	1.50
Total	4.11	4.21	neg.	1.70	8.00	1.50

HAP	tons/yr
Ethylene Glycol	0.74
Methyl Ethyl Ketone	0.74
Total	1.48

Surface Coating Process:

The emissions generated by the proposed plastic claddings surface coating process are VOC, PM, PM10, and HAP emissions. The following calculations determine the unrestricted potential to emit of these pollutants.

VOC:

The following calculations determine the VOC unrestricted PTE from the plastic claddings surface coating process based on use of the worst case coating, a density of 8.415 lb/gal, 53.59% VOC, a maximum coating rate of 0.40 gal/hr, emissions before controls, and 8760 hours of operation.

$$8.415 \text{ lb/gal} * 0.5359 * 0.40 \text{ gal/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = \mathbf{7.90 \text{ tons VOC/yr}}$$

HAP:

The following calculations determine the HAP unrestricted PTE from the plastic claddings surface coating process based on use of the worst case coating, a density of 8.415 lb/gal, a maximum of 5% ethylene glycol, a maximum of 5% methyl ethyl ketone (MEK), a maximum coating rate of 0.40 gal/hr, emissions before controls, and 8760 hours of operation.

Ethylene Glycol:

$$8.415 \text{ lb/gal} * 0.05 * 0.40 \text{ gal/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = \mathbf{0.74 \text{ tons EG/yr}}$$

MEK:

$$8.415 \text{ lb/gal} * 0.05 * 0.40 \text{ gal/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = \mathbf{0.74 \text{ tons MEK/yr}}$$

Total: 1.48 tons HAP/yr

PM/PM10 Overspray Emissions:

The following calculations determine the PM/PM10 unrestricted PTE based on a maximum coating usage of 0.40 gal/hr, a maximum wt% VOC of 53.59%, a transfer efficiency of 40%, emissions before controls, and 8760 hours of operation.

$$8.415 \text{ lb/gal} * 0.40 \text{ gal/hr} * (1 - 0.5359) * (1 - 0.40) * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = \mathbf{4.11 \text{ tons/yr}}$$

PM10 is determined to be equal to PM.

Natural Gas Combustion:

Natural Gas:

The following calculations determine the drying oven and air make-up unit PTE based on natural gas combustion, a combined maximum capacity of 3.95 MMBtu/hr, emissions before controls, AP-42 emission factors (Tables 1.4-1, 1.4-2, 1.4-3), 8760 hours/yr, and 1000 Btu/cf:

$$3.95 \text{ MMBtu/hr} * 8760 \text{ hr/yr} * 1 \text{ E6 Btu/MMBtu} * 1/1000 \text{ cf/Btu} * 1/1\text{E6 MMcf/cf} * \text{Ef lb poll/MMcf} * 1/2000 \text{ ton poll/lb poll} = \text{ton poll/yr}$$

	PM 1.9 lb/MMcf	PM10 7.6 lb/MMcf	SO2 0.6 lb/MMcf	NOx 100 lb/MMcf	VOC 5.5 lb/MMcf	CO 84 lb/MMcf
ton/yr	neg.	0.10	neg.	1.7	0.10	1.5

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls due to the proposed operation based on the above estimated emissions calculations. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	4.11
PM-10	4.21
SO ₂	neg.
VOC	8.00
CO	1.50
NO _x	1.70

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP	tons/yr
Ethylene Glycol	0.74
MEK	0.74
Total	1.48

Justification for Modification

The unrestricted potential to emit of all criteria pollutants from the plastic automotive door claddings surface coating process, and the single and combined HAP unrestricted potential to emit are at exempt levels.

Therefore, the proposed modification is determined to be an exemption under 326 IAC 2-1.1-3 for the purposes of New Source Review and an insignificant activity pursuant to 326 IAC 2-7-1(21).

The proposed modification shall be incorporated into the Title V permit via a minor permit modification pursuant to 326 IAC 2-7-12(b).

County Attainment Status

The source is located in Madison County.

Pollutant	Status
PM ₁₀	attainment or unclassifiable
SO ₂	attainment or unclassifiable
NO ₂	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Madison County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2 and 40 CFR 52.21.
- (b) Madison County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	3.4
PM10	3.4
SO ₂	0.1
VOC	249.0
CO	3.9
NO _x	18.5
Single HAP	31.3
Combination of HAPs	103.6

- (a) This existing source is not a major PSD stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more and it is not one of the 28 listed source categories.

- (b) This existing source is a Title V major stationary source because the VOC emissions exceed 100 tons per year, the worst case single regulated hazardous air pollutant (HAP) is emitted at a rate greater than 10 tons per year and the combined HAP emissions are greater than 25 tons per year.
- (c) The existing source emissions are obtained from the TSD for the Title V permit (095-6536-00044), issued on October 9, 1998.

Potential to Emit of Source After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Title V modification.

Process/facility	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Existing Source PTE	3.40	3.40	0.10	241.00	3.90	18.50	103.60
Modification PTE	4.11	4.21	neg.	8.00	1.50	1.70	1.48
Source After Proposed Revision	7.51	7.61	0.10	249.00*	5.40	20.2	105.08

Part 70 Major Source Threshold	-	100	100	100	100	100	10 ind. 25 tot.
PSD Threshold Level	250	250	250	100	250	250	-

* The source VOC emissions are limited to 249 tons per year.

- (a) This modification to the existing minor PSD stationary source is not major because the emissions after the modification are less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply.
- (b) This modification to the existing Title V permit will not change the status of the stationary source because the source VOC emissions and source worst case single and combined HAP emissions will still be greater than their respective thresholds of 100, 10, and 25 tons per year.

Federal Rule Applicability

New Source Performance Standards (NSPS):

There are no New Source Performance Standards (NSPS) that apply to the proposed modification.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

There are no National Emission Standards that apply to the proposed modification.

State Rule Applicability

Entire Source:

There are no entire source state rules that become applicable due to this proposed modification because the opacity limitations (326 IAC 5-1), fugitive dust limitations (326 IAC 6-4), and emission statement (326 IAC 2-6) already apply and the proposed modification is not a major source of hazardous air pollutants (326 IAC 2-4.1 does not apply).

Individual Facilities:

326 IAC 8-2-2 (Automobile and Light Duty Truck Coting Operations):

The surface coating process is not subject to 326 IAC 8-2-2 because the coating process coats automobile parts, not passenger car or passenger car derivatives as defined in 326 IAC 8-2-2(a).

326 IAC 8-2-9 (Miscellaneous Metal Coating):

The surface coating process is not subject to 326 IAC 8-2-9 because the coating is applied to plastic parts, not metal.

326 IAC 8-10 (Automobile Refinishing):

The surface coating process is not subject to 326 IAC 8-10 because the source is located in Madison County, not the applicable counties; Clark, Floyd, Lake, and Porter.

326 IAC 8-1-6 (State BACT Requirements):

Although there are no other Article 8 rules that apply, the surface coating operation is not subject to 326 IAC 8-1-6 because the unrestricted potential to emit (8.00 tons/yr) are less than the applicable level of 25 tons/yr.

326 IAC 6-3-2 (Process Operations):

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) overspray from the door claddings surface coating process shall be determined utilizing the following equation.

$$E = 4.10 * P^{0.67}$$

where: P = Process Weight Rate, tons/hr
E = Emission Rate, lb PM/hr

Compliance Determination

No stack testing shall be required

Compliance Monitoring

Compliance monitoring and a preventive maintenance plan shall be required because no specific 326 IAC 6-3-2 limit is established, yielding an undefined allowable rate that may potentially exceed the applicable PM compliance monitoring level of 10 lbs PM/hr.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

Condition A.3 shall be amended to include the units of the proposed surface coating process.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Coating materials test booth.;
- (b) One (1) natural gas direct fired bake oven consisting of five (5) separate combustion zones identified as OPS-new (1.0 MMBtu/hr, rated), O1-new (3.5 MMBtu/hr, rated), O2-new (3.5 MMBtu/hr, rated), O3-new (3.5 MMBtu/hr, rated), and QZS-new (1.0 MMBtu/hr, rated), with a total heat input rate of 12.5 MMBtu/hr, all exhausting through four (4) stacks identified as ADOE1, ADOE2, ADEP1 and ADEP2.; and
- (c) **One (1) plastic automotive door claddings surface coating process, with a maximum throughput rate of 60 units per hour, including:**
 - (1) **one (1) surface coating booth, with PM/PM10 emissions controlled by a dry filter system, with emissions exhausted through Stack CE-1,**
 - (2) **one (1) 3.40 MMBtu/hr natural gas fired air make-up unit, and**
 - (3) **one (1) 0.55 MMBtu/hr natural gas fired drying oven, with emissions exhausted through Stack CO-1.**

A new Section D.2 shall be created for the surface coating process including all applicable requirements.

SECTION D.3 FACILITY CONDITIONS

One (1) plastic automotive door claddings surface coating process, with a maximum throughput rate of 60 units per hour, including:

- (a) one (1) surface coating booth, with PM/PM10 emissions controlled by a dry filter system, with emissions exhausted through Stack CE1,**
- (b) one (1) 3.40 MMBtu/hr natural gas fired air make-up unit, and**
- (c) one (1) 0.55 MMBtu/hr natural gas fired drying oven, with emissions exhausted through Stack CO-1.**

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) overspray from the door claddings surface coating process shall be determined utilizing the following equation.

$$E = 4.10 * P^{0.67}$$

where: P = Process Weight Rate, tons/hr
E = Emission Rate, lb PM/hr

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination

D.3.3 Particulate Matter (PM)

In order to comply with Condition D.3.1, the PM control shall be in operation and controlling emissions at all times the automotive claddings surface coating process is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.4 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack CE-1 while the claddings surface coating process is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step.

Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.5 Record Keeping Requirements

(a) To document compliance with Condition D.3.1, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

The Table of Contents shall be amended to include a new Section D.3 for the proposed wall manufacturing operation.

D.3 FACILITY OPERATION CONDITIONS - Auto Claddings Surface Coating Process 29a

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(c)] 29a

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)] 29a

Compliance Determination Requirements

D.3.3 Particulate Matter (PM) 29a

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.4 Monitoring 29a

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.5 Record Keeping requirements 29a

Conclusion

The operation of this proposed modification shall be subject to the conditions of the attached proposed Title V minor permit modification T 095-14419-00044.